

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                  |   |                          |
|----------------------------------|---|--------------------------|
| -----                            | X |                          |
|                                  | : |                          |
| TREVOR BAUER,                    | : | No. 1:22-cv-1822-PAC-OTW |
|                                  | : |                          |
| Plaintiff,                       | : |                          |
|                                  | : |                          |
|                                  | : | ECF Case                 |
| -against-                        | : |                          |
|                                  | : |                          |
|                                  | : |                          |
| CHRIS BAUD, and G/O MEDIA, INC., | : |                          |
|                                  | : |                          |
| Defendants.                      | : |                          |
|                                  | : |                          |
| -----                            | X |                          |

**DECLARATION OF LYNN B. OBERLANDER IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

Pursuant to 28 U.S.C. § 1746, Lynn B. Oberlander hereby declares as follows:

1. I am a member of the Bar of this Court and of counsel at the law firm of Ballard Spahr LLP, counsel to Defendants Chris Baud and G/O Media, Inc., in this Action.
2. I make this Declaration in support of Defendants' motion to dismiss the Complaint filed by Plaintiff Trevor Bauer.
3. Attached hereto as Exhibit A is a true and correct copy of a Request for Domestic Violence Restraining Order, filed by L.H. in the Superior Court of Los Angeles County, California on June 29, 2021, against Trevor Bauer. *See Lindsey Hill v. Trevor Bauer*, 21STRO03198 (Sup. Ct. Los Angeles Cnty.).
4. Attached hereto as Exhibit B is a true and correct copy of the June 29, 2021 article published by *TMZ* and titled "WOMAN ACCUSES MLB STAR OF ASSAULT . . . Bauer Denies Allegation," available at <https://www.tmz.com/2021/06/29/trevor-bauer-accused-of-assault-woman-files-restraining-order-pitcher-denies-allegations/>.

5. Attached hereto as Exhibit C is a true and correct copy of the updated June 30, 2021 article published by *The Athletic* and titled “*Graphic details, photos emerge in restraining order filed against Dodgers pitcher Trevor Bauer,*” available at <https://theathletic.com/2682479/2021/06/30/graphic-details-photos-emerge-in-restraining-order-filed-against-dodgers-pitcher-trevor-bauer/>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 10, 2022  
New York, New York

/s/ Lynn B. Oberlander  
Lynn B. Oberlander